



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date April 12, 2005

Time Start _____

Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT**GENERATOR****S Q GENERATOR**

Folder GEN1-AdmRec? N



500002503

Company name SONOCO PRODUCTS COMPANYI.D. Number PAD057160780Site Address 300 SOUTH BRANDYWINE AVENUE, DOWNINGTOWN, PACounty Chester Municipality DOWNINGTOWN BOROUGH Zip 19335Name of Inspector Paul JardelName & Title of Responsible Official Scott Schultz, Water Supervisor / Peggi-Ann Davis, Environmental PrincipalPerson Interviewed SAA Telephone (610) 269-3300

Mailing Address (if different from above) _____

Amount of Hazardous Waste Generated per Month: See comments <220 Pounds Kgs**1. Site Characterization:**STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad**2. Universal Waste:** ☐ Large Quantity Handler ☒ Small Quantity HandlerUniversal Waste Types Fluorescent Lighting**3. Hazardous Waste Transporters:**Transporter Name Safety Kleen License Number 0172

Transporter Name _____ License Number _____

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

| Waste Code | Waste Description | Destination Facility |
|------------|-------------------|----------------------------|
| D001 | Parts washers | S. Kleen, West Chester, PA |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name SONOCO PRODUCTS ID Number PAD057160780 Date 4/12/2005

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

| 1 | 2 | 3 | 4 | REQUIREMENT | PA CIT. 25 PA Code | FED. CIT. 40 CFR | LINE NO. |
|-------------------------------------|-------------------------------------|-------------------------------------|--------------------------|---|-----------------------|---------------------------|-------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Hazardous waste determination performed on all waste streams | 262a.10 | 262.11 | H001 |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Identification Number | 262a.10 | 262.12 | H002 |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Authorized transporters only | 262a.10 | 262.12(c) | H003 |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Subsequent notification requirements met | 262a.12(b) | | H004 |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Proper manifest used | 262a.10 | 262.21 | H005 |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Manifests filled out correctly and completely | 262a.20 | | H006 |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Manifests signed and routed properly | 262a.23(a) | 262.23 | H007 |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Generator waste accumulated on site for 90 days or less | 262a.10 | 262.34(a) | H008 |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days | 262a.10 | 262.34(e)(f) | H009 |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | SQG waste accumulated on-site never exceeds 6000 kg | 262a.10 | 262.34(e)(f) | H010 |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Satellite accumulation requirements complied with | 262a.10 | 262.34(c) | H011 |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Personnel training program per 265.16 complied with | 262a.10 | 262.34(a)(4) 262.34(d) | H012 |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Manifest exception and biennial reports retained for 3 years | 262a.10 | 262.40(a)(b) | H013 |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Specified records retained for three years | 262a.10 | 262.40(c) | H014 |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Biennial reports submitted to the Department (LQG only) | 262a.41 | 262.41 | H015 |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Exception reporting procedures followed | 262a.42 | 262.42 | H016 |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Spill reporting procedures followed | 262a.10 | 262.34(d) | H017 |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | PPC plan developed and implemented | 262a.10 | 262.34(a) | H018 |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Special requirements followed for international shipments | 262a.10 | 262.50 262.60 | H019 |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Source reduction strategy prepared and available (LQG only) | 262a.100 | | H020 |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Excluded waste complies with exclusionary requirements | 261a.4 | 261.4 | H021 |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | | |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | | |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | | |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | | |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | | |

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 04/12/05 Identification Number PAD057160780Company/Facility/Site Name Sonoco Products Co. .

This waste generator inspection was conducted by Department Solid Waste Specialist Paul Jardel with permission of Peggi-Ann Davis and Scott Schultz of Sonoco. The inspection was done as a result of a 3/20/05 fire at the facility. There was minimal damage done to the Sonoco mill on the East side of Rt. 322, but the company has decided to shut the plant down. There were no land or water releases to the environment during the incident.

Routinely generated hazardous wastes were limited to three Safety Kleen parts washers. Universal wastes were also generated.

The facility is currently listed as a small quantity generator, but was operating as a conditionally exempt SQG until the incident. It is possible that cleanup operations will generate large quantities of waste (>2200 lb/mo.). In that event Sonoco should send a subsequent notification and then again when generation ceases.

Other possible materials that would need to be managed are possible D002 wastes: Acetic Acid, Sodium Carbonate, and Sodium Hydroxide.

No violations were observed during this inspection.



This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) [Signature] Date 4/12/05Inspector (signature) [Signature] Date 4/12/05Copy given and mailed to facility

Page ____ of ____



ACKNOWLEDGEMENT OF NOTIFICATION
OF REGULATED WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

+
PAD057160780

INSTALLATION ADDRESS

SONOCO PRODUCTS COMPANY
300 BRANDYWINE AVE
DOWNTOWN , PA 19335
A.D. HARRIS PLANT MGR

300 BRANDYWINE AVE
DOWNTOWN , PA 19335